

Informationen zur Verordnung (EU) Nr. 1907/2006 (REACH)

Stoffe der sogenannten Kandidatenliste (substances of very high concern oder SVHCs)

Gemäß der REACH-Terminologie handelt es sich bei den von der CMC Klebtechnik GmbH hergestellten und vertriebenen Produkten um Erzeugnisse. Einige dieser Erzeugnisse enthalten Stoffe, die auf der Kandidatenliste als SVHCs (substances of very high concern oder besonders besorgniserregende Substanzen) zusammengefasst sind.

Art. 33 der REACH-Verordnung verpflichtet uns dazu, Informationen zu Produkten, die Stoffe der Kandidatenliste enthalten, in der Lieferkette weiterzugeben, wenn folgende Bedingung erfüllt ist:

- Der Stoff ist in einer Menge $> 0,1$ Gew.-% im homogenen Werkstoff enthalten.

Mit dem vorliegenden Schreiben kommen wir dieser Verpflichtung nach. Die Informationspflicht trifft auf alle in der untenstehenden Tabelle aufgezählten CMC-Produkte zu. Die Auskünfte sind aktuell und wurden nach bestem Wissen und Gewissen zusammengestellt. Bitte beachten Sie, dass unsere Produkte mit Informationspflicht **REACH-konform** sind; es besteht für uns lediglich die Verpflichtung zur Weitergabe von Informationen.

Üblicherweise werden Sie durch eine Bemerkung in Lieferpapieren oder in Datenblättern auf diese Stellungnahme verwiesen. Bitte prüfen Sie anhand der CMC-Typennummer, welche Substanz im von Ihnen bezogenen Produkt vorliegt (Mehrfachnennungen sind möglich).

Dieses Dokument gilt für den letzten Aktualisierungsstand der Kandidatenliste:

- 19.1.2021 (mit insgesamt 211 Einträgen)

Eventuell durch unsere Kunden zur Verfügung gestellte Materialien / Rohstoffe werden durch die vorliegende Erklärung nicht abgedeckt.

In Anhang finden Sie darüber hinaus Original-Stellungnahmen von DuPont zu den Produkten Nomex® und Kapton®.



i.V. Michael Renken

Entwicklung

Gesamtübersicht

CMC-Produkte, die Substanzen der Kandidatenliste mit mehr als 0,1 Gew.-% enthalten:

Bezeichnung	SVHCs	CAS-Nr.	Menge	Beschreibung
CMC 10535, CMC 10678, CMC 10745, CMC 10759, CMC 10792, CMC 10814, CMC 10897, CMC 10906, CMC 10917, CMC 10931, CMC 10962, CMC 10972, CMC 12060, CMC 61401, CMC 70175, CMC 70927, CMC 70964	1,6,7,8,9,14,15,16,17,17,18,18-Dodecachlorpentacyclo[12.2.1.1.1 6,9.02,13.05,10]octadeca-7,15-dien ('Dechlorane Plus')	13560-89-9	ca. 28 Gew.-% (Bezug: Heißsiegelschicht)	Folien mit flammhemmender Polyesterharzbeschichtung für Heißsiegelprozesse, vorwiegend zur Laminierung von Flachkabeln
CMC 15603, CMC 15707, CMC 19110, CMC 19708, CMC 382XX, CMC 65050, CMC 65080, CMC 65120, CMC 65121, CMC 65122, CMC 65123, CMC 65124, CMC 65130, CMC 65180, CMC 65220, CMC 65221, CMC 65222, CMC 65223, CMC 65224, CMC 65250, CMC 65300, CMC 65301, CMC 65380, CMC 65842	N,N-Dimethylacetamid (DMAc)	127-19-5	bis ca. 0,5% (Bezug: Nomex®-Papier)	Nomex® von DuPont, meist weiterverarbeitet zu Klebebändern und Laminaten
CMC 7004X, CMC 70076, CMC 70430, CMC 70810, CMC 70906, CMC 737XX, CMC 74XXX, Kapton 200EKJ, Kapton 200EKJ-CP, Kapton 300MT, Kapton MT+	N,N-Dimethylacetamid (DMAc)	127-19-5	bis ca. 1% (Bezug: Kapton®-Folie)	Kapton® von DuPont, meist weiterverarbeitet zu Klebebändern und Laminaten
CMC 35150, CMC 35160, CMC 35166	4-(1,1,3,3-tetramethylbutyl)phenol	140-66-9	bis ca. 0,11% (Bezug: komplettes Klebeband, der Stoff befindet sich in der Klebschicht)	Klebebänder auf Basis Acetatseide
CMC 70971	Nonylphenoletoxylat	68412-54-4	bis ca. 3% (Bezug: Klebschicht)	Klebeband mit Acrylatkleber
3M 3669(C)	8-Oxa-3,5-dithia-4-stannatetradecanoic acid, 10-ethyl-4,4-dioctyl-7-oxo-, 2-ethylhexyl ester 8-Oxa-3,5-dithia-4-stannatetradecanoic acid, 10-ethyl-4-[[2-[(2-ethylhexyl)oxy]-2-oxoethyl]thio]-4-octyl-7-oxo-, 2-ethylhexyl ester	15571-58-1 27107-89-7	jeweils >0,1% laut 3M	Klebeband auf Basis PVC-Folie
CMC 15100, CMC 15603, CMC 70115, CMC 70121, CMC 70124, CMC 70752, CMC 70849, CMC 77701, CMC 90150	Dicyclohexylphthalat	84-61-7	ca. 1 - 1,7 Gew.-% (nur Klebschicht)	Klebebänder mit verschiedenen Silikonklebschichten

Ein X in der Typenbezeichnung steht für die Ziffern 0 bis 9.

Anhang:

- Original-Stellungnahmen von DuPont zu deren Produkten Kapton® und Nomex®

Bitte beachten Sie, dass z.B. Nomex dahingehend optimiert wurde, dass die Informationspflicht nach REACH für DuPont schon seit einiger Zeit entfällt. Solange unsere Erzeugnisse DuPont-Material älteren Datums nutzen, kann es trotzdem sein, dass zeitgleich eine Informationspflicht für CMC-Produkte gilt.



DuPont™ KAPTON®

COMMUNICATION ON ARTICLES CONTAINING DMAC

Dear Customer,

KAPTON® Polyimide Films are articles per definition of EU regulation 1907/2006/EC (REACH) with no substances intended to be released during their use. For substances in articles there is no obligation for authorization. As such Annex XIV sunset dates do not apply.

For articles no legal obligation exist to provide SDS. Nevertheless, DuPont introduced Article Information Sheets (AIS), to be sent to our customers buying Articles on a voluntary basis. These documents contain the appropriate level of information on safe use of DuPont articles similar to Safety Data Sheets.

The European regulation REACH requires communication of safe use information for substances which are listed on the "Candidate List" because they meet the criteria as a Substance of Very High Concern (SVHC) and are present in articles in a concentration above 0.1% weight by weight (w/w). For articles containing substances that meet these criteria their identity and concentration range are listed on product AIS.

Certain grades of Kapton® Polyimide Films contain unintended residual amount of EC-No. 204-826-4 N,N-Dimethylacetamide (DMAC) above 0.1%. This has been communicated to you by our REACH bulletin and/or product Article Information Sheets accordingly.

DuPont Interconnect Solutions (ICS) business is looking into the use of alternative solvents for the manufacturing of Kapton® Polyimide Films but did not identify a suitable replacement for DMAC yet. We continue our efforts to replace hazardous substances in our products or to reduce their amounts.

While REACH does not define a test method for analysis of DMAC in polymers residual DMAC test results will vary by the test method & exposure conditions utilized during the testing process.

Samples analysed by GCMS Headspace at 30°C for 8 hours did not release any DMAC above the detection limit of 1 ppm. Experiments showed that samples analysed by GCMS Headspace at 400°C for 1 hour lost only 1% of the total DMAC detected by the DuPont disintegrative test method.

Due to polar interaction DMAC has a strong affinity to the polyimide polymer. While this affinity of DMAC is a limitation for production of polyimide films on the other hand it prevents significant exposure to DMAC during handling and storage.

I hope this answers your questions and provides you sufficient information to determine obligations of your company as European downstream user as well as importer.

Sincerely,

Olaf Niber

Regulatory/Product Stewardship Consultant
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DuPont™ Interconnect Solution

REACH COMPLIANCE AND SVHC DECLARATION FOR KAPTON® POLYIMIDE FILMS

Dear Customer,

This is in response to your recent inquiry about the European Union's ("EU") regulation 1907/2006/EC (REACH) and DuPont Interconnect Solutions (ICS) products.

DuPont is committed to comply in every respect to the requirements of REACH and relevant amendments.

KAPTON® Polyimide Films fulfil the criteria of an article as defined by REACH Article 3(3). There are no substances intended to be released from the products as defined by REACH article 7(1) under normal or reasonably foreseeable conditions of use.

Under the above conditions, articles are exempt from registration under REACH.

To our current knowledge certain DuPont™ KAPTON® products as provided below are containing the following substance listed on the Candidate list of Substances of Very High Concern (SVHC) http://echa.europa.eu/chem_data/candidate_list_table_en.asp, as published on the ECHA website on 16 January 2020, in an individual concentration of > 0.1 % by weight:

N,N-dimethylacetamide (DMAC), EC 204-826-4, CAS 127-19-5

Products				DMAC concentration
150EKJ	200EKJ	200EKJ-CP	350ELJ	0.1% - 0.3%
300MT	150SAKJ	200SAKJ	275XC*	
300FPC-ZT*	300NA*	500NA*	300PI-H*	
500PI-H*				0.3 – 0.6 %
100MT+	150MT+	200MT+	300MT+	
500MT+	600FN051*			

(*indicates regionally specific products)

Results from product evaluations show that DMAC is not released at detectable levels under ambient temperatures. Estimated exposures to downstream workers handling the above DuPont ICS products and the general public from use of the final products, are all well below the levels of concern.

To our current knowledge the above listed DuPont ICS products do neither contain any substance listed on REACH Annex XIV nor on Annex XVII above the applicable declaration limits and for the intended use.

To understand fully the obligations under REACH, we recommend that you consult the REACH web site at <http://echa.europa.eu>

Sincerely,

Katherine Bernardina
Product Stewardship and Regulatory
DuPont Electronics & Imaging

REACH Compliance

DuPont for NOMEX®

Categories: Paper, Pressboard, Floc and Fibrils

META-ARAMID FIBERS

At DuPont, Product Stewardship is an important aspect of our supply chain relationships. We maintain an unwavering commitment to safety for our employees, our contractors, and the communities in which we operate and we share that concern for all who handle our products. As both a manufacturer and importer/exporter of substances¹ covered under REACH, DuPont has established a team to address all of the requirements as they apply to our suppliers, our customers, and our own operations.

The purpose of this communication is to inform you of our current plans:

- DuPont is ensuring that all products sold to our EU and EEA customers by DuPont legal entities in Europe² are in compliance with REACH regulatory requirements, including (pre-)registration³.
- DuPont does not intend to communicate REACH pre-registration numbers based on guidance in CEFIC REACH Industry Preparation Letter No 9.

REACH requires registration for individual substances (on their own or in preparations⁴) greater than 1 metric ton per year produced or imported.

Each importer is responsible for its own compliance with REACH.

The products mentioned above, in our opinion, fulfil the criteria of being classified as "articles"⁵. There are no substances intended to be released from these products under normal or reasonably foreseeable conditions of use⁶.

The above articles sold by DuPont under NOMEX® and formed after July 2016 to our current knowledge do not contain substances above the legal threshold that are on the 'Candidate List' of Substances of Very High Concern (SVHC) as published on the ECHA website - latest on 15-01-2018.

In early 2016, DuPont finished the implementation of a process technology upgrade to Nomex® fiber production equipment that improved the fiber washing process, reducing the residual content of ,N-dimethylacetamide (DMAc) EINECS 204-826-4 to less than 0.1 % (w/w). As a result, Nomex® paper and pressboard made from these fibers does not exceed the REACH threshold for notification. The transition can be marked using the roll numbers below based on the first two digits:

C1	C134004XXX	C4	C481000XXX	F1	F178162XXX
C2	C243140XXX	C5	C522045XXX	F2	F277263XXX
C3	C350269XXX				

Under the above conditions, articles are exempt from registration under REACH.

To our current knowledge, all substances contained in the above articles are in compliance with the conditions of restrictions of REACH Annex XVII. DuPont will communicate in due course any changes due to future amendments of Annex XVII that may impact the manufacture, placing on the market or use of the substances contained.

To understand fully the obligations that you will have under REACH, we recommend that you consult the REACH web site at <http://echa.europa.eu>

DuPont REACH web site: <http://reach.dupont.com>

Sincerely,


Pablo Blanco
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¹ Substance: a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (REACH, Art. 3.1).

² This includes the DuPont legal entities in the EU/EEA, as well as, DuPont de Nemours International S.A. and DuPont International Operations Sàrl.

³ DuPont, for its products and brands, has submitted (pre-)registration files to ECHA for the substances requiring (pre-)registration that are manufactured/imported by DuPont. Receipt of those files has been acknowledged by ECHA. As per today's knowledge, the substances that DuPont is purchasing on the European market have been (pre-)registered by their respective manufacturers or importers.

⁴ Preparation: means a mixture or solution composed of two or more substances (REACH, Art. 3.2).

⁵ Article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition (REACH, Art. 3.3).

⁶ As per REACH Art. 7.1 b.

This information is based on our current level of knowledge and expresses only our intention. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.



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